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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ECF CASE

-----X
EDWARD WALSH,

07 Civ. 3729 (VM)(HP)

Plaintiff,

-against-

**DECLARATION OF
JOHN R. KEOUGH, III**

WOR RADIO, a/k/a BUCKLEY BROADCASTING
COMPANY,

Defendant.
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JOHN R. KEOUGH, III declares:

1. I am a member of the firm of Waesche, Sheinbaum & O'Regan, P.C., attorneys for plaintiff Edward Walsh.

2. I am fully familiar with all of the pleadings and proceedings herein and respectfully submit this declaration in opposition to defendant's motion to dismiss or stay pending arbitration.

3. Prior to the commencement of the instant action, WOR's counsel asserted to me that WOR considers Mr. Walsh was not a staff announcer under the Collective Bargaining Agreement between Buckley Broadcasting Corporation and American Federation of Television and Radio Artists – New York Local, Effective September 1, 2003 – August 31, 2007, for Staff Announcers and Newspersons ("the CBA").

4. Mr. Walsh commenced arbitration on November 22, 2006, as a precaution against potential time limitations in the event the CBA were to apply.

I declare under penalty of perjury under the laws of the United States of America that the above declaration is true and correct.

Executed this 10th day of August 2007, at New York, New York.

/s/
JOHN R. KEOUGH, III